

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE,  
2011

Docket No. N2011-1

**NOTICE OF UNITED STATES POSTAL SERVICE CONCERNING ERRATA  
TO RESPONSE OF WITNESS BOLDT TO NAPUS INTERROGATORY  
NAPUS/USPS-T1-42 [ERRATA]  
(September 7, 2011)**

The United States Postal Service (Postal Service) hereby provides notice that it is filing errata to the response of witness Boldt to Interrogatory NAPUS/USPS-T1-42, which was filed on September 2, 2011. A copy of the revised response to NAPUS/USPS-T1-42 is attached to this notice. The corrected text is shown in gray highlighted text.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Michael Tidwell  
Kenneth Hollies

Anthony F. Alverno  
Chief Counsel, Global Business

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2997; Fax -5628  
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RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS BOLDT TO INTERROGATORY OF NAPUS

Revised: September 7, 2011

**NAPUS/USPS-T1-42.**

Please refer to NAPUS/USPS-T1-2. Could you please identify those 2,800 candidate post offices that serve communities that fall within the Postal Service's understanding of §101(b) of Title 39 (i.e., rural areas, communities and small towns where post office are not self-sustaining)?

**RESPONSE:**

In library reference USPS-LR-N2011-1/2 (tab "new\_2hours"), the Postal Service identified all of the facilities embraced by its Request for an advisory opinion, including the "over 2800" Low Workload Post Offices with annual revenue less than \$27,500. (USPS-T-1 at 14-15.) Data for respective offices were later made available in library reference USPS-LR-N2011-1/NP3.

The Postal Service has not labeled specific Post Offices as falling within the ambit of 39 U.S.C. §101(b). While a large proportion of offices is not self-sustaining, which is no surprise given the nature of a network industry and the patterns by which mail is entered for delivery throughout the delivery network of 151 million plus delivery points, section 101(d) only applies to "small" Post Offices. Nevertheless, the availability of or access to postal services is not metered based upon whether an office is or is not self-sustaining. Rather, most Post Offices offer the full range of products and services needed by individual customers. Indeed, proliferation of alternate access opportunities frees the Postal Service and its customers from measuring individual access to postal services exclusively by proximity to carrier delivery and brick/mortar facilities operated by postal employees.

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS BOLDT TO INTERROGATORY OF NAPUS

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**RESPONSE to NAPUS/USPS-T1-42 (continued):**

While those Post Offices open only two hours per weekday – since they are by definition the smallest in the system – can be viewed as “small” Post Offices and as such plausible candidates for being subject to section 101(b), some of them may no longer fit fully within the description that section provides. Small offices quite commonly once served small communities, but some were eventually surrounded by suburban growth. So, in our view, size of a postal facility alone cannot define the applicability of section 101(b).

The Postal Service, however, has no specific legal requirement or business need for actually concluding that section 101(b) applies to a specific office.<sup>1</sup> It is one of four statutory considerations that must, in any event, be considered in the context of discontinuance studies. Title 39 U.S.C. § 404(d)(2)(A)(iii) requires the Postal Service to consider:

(iii) whether such closing or consolidation is consistent with the policy of the Government, as stated in section 101 (b) of this title, that the Postal Service shall provide a maximum degree of effective and regular postal services to rural areas, communities, and small towns where post offices are not self-sustaining;

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<sup>1</sup> If it did, then a regulatory system that defined specific criteria such as “rural”, “community” and “small towns” plus a parallel system to administer admission to and departure from qualification would also seem to be necessary.

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS BOLDT TO INTERROGATORY OF NAPUS

**Revised: September 7, 2011**

**RESPONSE to NAPUS/USPS-T1-42 (continued):**

in every discontinuance study. The Postal Service accordingly understands section 101(b) as illustrating broad policy embodying the breadth of its universal service obligation: every customer, including those in small, isolated towns, needs regular and effective access to the sending and receipt of mail, needs that define the minimum necessary access to postal service.